

Troutman Pepper Hamilton Sanders LLP  
Hercules Plaza, 1313 N. Market St., Suite 5100, P.O. Box 1709  
Wilmington, DE 19899-1709



troutman.com

**Joanna J. Cline**  
302.777.6542  
joanna.cline@troutman.com

December 23, 2020

**VIA CM / ECF**

Judge Lewis J. Liman  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: *Eastern Profit Corp. Ltd. v. Strategic Vision US LLC*, C.A. No. 18-cv-2185 (LJL)**

Dear Judge Liman:

We write in response to the Court's Order of December 18 (Dkt. 309) directing the parties to file letters indicating their positions on proceeding with a remote bench trial in this action in the event that Standing Order M-10-468 is extended.

Eastern Profit is prepared to proceed to trial on January 19 even if the trial must proceed remotely. Consistent with the position we took in our letter of October 7 (Dkt. 292), we believe that in the compelling circumstances created by COVID-19, good cause exists under Rule 43(a) to proceed with remote transmission.

Eastern Profit objects to any further delay of this case, which was filed in March 2018. Pushing the trial out even further past the prior November 9 trial date would no longer constitute the "short delay" contemplated by the Court in its October 13 Order (Dkt. 296), and waiting until an in-person trial is feasible may delay the trial several more months. Eastern Profit looks forward to its day in court.

Respectfully,

/s/ Joanna J. Cline

Joanna J. Cline

cc: All Counsel of Record (By CM/ECF)